

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISRICT OF PUERTO RICO**

IN RE:

HERNAN OCASIO RAMOS
LUZ DELIA DIAZ

CASE NO: 2005-05091 (ESL)

HERNAN OCASIO RAMOS
LUZ DELIA DIAZ

CHAPTER 13 (AOR)

Plaintiffs

ADV.PROC.NO. 2006-00181

VS.

PRAMCO II, LLC,
FRANCISCO FERNANDEZ
CHIQUES ET. ALS.

**VIOLATION OF THE DISCHARGE
INJUNCTION**

Defendants

.....

MOTION REQUESTING PROTECTIVE ORDER

TO THE HONORABLE COURT:

COMES NOW, PLAINTIFF, **HERNAN OCASIO RAMOS AND LUZ DELIA DIAZ**,
through the undersigned attorney, ALLEGES, STATES, PRAYS and
REQUESTS RELIEF:

1. Upon agreement of the parties, plaintiff's
deposition was scheduled to be taken tomorrow May
1st, 2007, at 9:30am and 11:00 am, at co-defendant
PRAMCO II, LLC legal counsels office.

2. Today on/or around 1:00 pm, the undersigned contacted plaintiffs, to reconfirm their deposition and was informed by co-plaintiff, Luz Delia Diaz that same would not be possible since tomorrow under strict physicians order, Mr. Hernan Ocasio would have to undergo an Echo Doppler and EKG studies, since he recently suffered a high blood pressure event which caused him to faint.
3. This was explained by e-mail letter to PRAMCO'S legal counsel who now refuses to reschedule deposition if he does not receive a medical excuse/evidence by tomorrow morning before 9:30 am.
4. PRAMCO'S legal counsel's demand as requested will not be possible until after Wednesday May 2nd, 2007 at which time the doctor will review the tests results and issue the waiver requested to him, in order for him to approve that co-plaintiff is able to participate in the deposition at this time.
5. The undersigned called PRAMCO'S legal counsel's office right after his e-mail, in order to avoid recurring to this Honorable Court, but he could not be reached.
6. Under this circumstance, herein party does not have any other alternative but to request this Honorable

Court's intervention to grant the reschedule of plaintiff's deposition until a physician's clearance is received.

WHEREFORE, we respectfully ask this Court to issue an Order allowing the reschedule of plaintiff's depositions until a physician's clearance is received allowing co-plaintiff Hernan Ocasio Ramos to be deposed together with his wife Luz Delia Diaz, and in it's consequence order Pramco not to open the record tomorrow May 1st, 2007.

I hereby certify that I electronically filled the foregoing with the clerk of the Court using the CM/ECF System which will send notification of such filling to all CM/ECF participants and to the following: co-defendant Pramco Chapter 13 Trustee **Alejandro Oliveras Rivera, Esq.**, US Trustee **Monsita Lecaroz Arribas** and I hereby certify that I have mailed by regular mail to all non CM/ECF participants interested parties to their address of record.

In San Juan, Puerto Rico this 30th day of April, 2007.

RESPECTFULLY SUBMITTED

/s/ MARILYN VALDES ORTEGA, ESQ.
MARILYN VALDES ORTEGA, ESQ.

USDC-PR: 214711

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